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Clerk to:

Culture, Media and Sport Committee
7 Millbank
House of Commons
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Dear Madam

I understand that the committee is seeking to understand in detail, who was involved in the negotiations that led to the settlement between Gordon Taylor and News Group Newspapers. I acted for Gordon Taylor and conducted the negotiations with Julian Pike ("Mr Pike") of Farrer & Co.

There is one matter of the negotiations regarding the Gordon Taylor settlement that is likely to be very relevant to the deliberations of the Select Committee. I would be able to attend to give further evidence if required. It relates to a conversation that I had with Mr Pike leading up to the settlement.

James Murdoch gave evidence to the Select Committee about advice from "external counsel". In doing so he has waived the privilege in that advice. In that context it becomes relevant that during the negotiations Julian Pike said to me "you are negotiating with Murdoch". I did not know whether he meant Rupert Murdoch or James Murdoch at that time but it seems likely that the reference was to James.

As News Group have given limited permission to Harbottle and Lewis to provide information they might (without breaching the confidence of Gordon Taylor) also give permission to Farrer & Co to provide copies of their "file/attendance notes" showing who they got instructions from, and if relevant who the person giving those instructions said they had consulted and what advice had been given as to the quantum of the claim. I presume that such documentary evidence (redacted to preserve the confidentiality of Mr Taylor's settlement) would assist in determining the truth of the position.

When I gave evidence on 2 September 2009 I indicated that I was under a threat of an injunction from News Group through Farrer & Co solicitors that I characterised as "please



do not act you know too much". I never heard any more of that threat. I realise that one matter that I knew that the other solicitors who were not under threat did not was the conversation that I had with Mr Pike who told me the ultimate source of his instructions.

I would hope that News Group Newspapers and Farrer & Co will cooperate as this should indicate why Mr Pike made his statement to me.

Yours faithfully

Mark Lewis
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Taylor Hampton